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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
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September 10, 1998

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**By Hand Delivery**

Ms. Magalie R. Salas, Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

**Re: Notice of Ex Parte Communication;  
PR Docket No. 92-235**

Dear Ms. Salas:

On September 8 and 9, 1998, the American Automobile Association ("AAA") met with the FCC Chairman, two Commissioners and several staff members to discuss AAA's Petition for Reconsideration in the private radio "refarming" proceeding, PR Docket No. 92-235. Specifically, AAA President and CEO Robert Darbelnet, Managing Director of Government Relations Susan Pikrallidas, Frequency Coordinator Gary Ruark, and outside counsel Michele Farquhar of Hogan & Hartson met with Chairman William Kennard, Commissioners Michael Powell and Harold Furchtgott-Roth, and FCC staff Daniel Connors, Peter Tenhula, and D'wana Terry. AAA discussed matters related to its reconsideration petition, highlighting the issues raised in the attached hand-out (previously filed with the FCC on May 22, 1998). In addition, Karen Gulick, Legal Advisor to Commissioner Gloria Tristani, was contacted by telephone on Thursday, September 10 regarding these same materials.

Two copies of this letter are provided in accordance with the Commission's rules. Please date-stamp and return a copy of this letter. Please refer any questions regarding this matter to me at (202) 637-5600.

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

Sincerely,



Michele C. Farquhar  
Counsel for AAA

Enclosures

cc: Chairman William Kennard  
Commissioners Michael Powell, Harold Furchtgott-Roth  
Daniel Connors, Peter Tenhula, Karen Gulick, D'wana Terry

# Five Reasons FCC Should Grant AAA's Petition for Reconsideration

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- **Time is critical to emergency road service functions.**
- **Increasing interference/coordination problems have occurred with current approach.**
- **Emergency road service meets all the “quasi-public safety” characteristics cited by the FCC for railroads, power and petroleum companies.**
- **Minimal impact on other radio frequency assignments.**
- **AAA emergency road service has already been recognized as a vital public safety service by Congress and by many public safety entities**

# Time Critical Functions

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- AAA responds to over 29 million calls per year -- 80,000 per day
- 30 percent of AAA's service calls -- 8 million per year -- involve situations where there is *immediate threat to life or property*
- AAA coordinates closely with public safety officials, especially during mass emergency situations and urban area incident management response

# Increased Interference

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- Assignment of Auto Emergency frequencies by coordinators other than AAA could delay AAA's ability to respond in emergency situations
- Some AAA clubs already experience specific interference problems
- AAA expects a sharp increase in coordination and interference problems by year-end

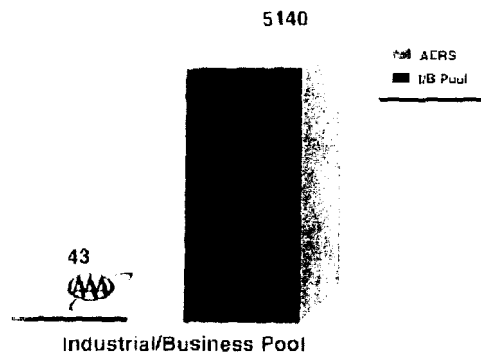
# AAA Meets FCC “Quasi-Public Safety” Characteristics

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- **As a not-for-profit emergency services provider, AAA is seeking the same control over coordination as other non-governmental entities that serve significant safety needs: railroads, petroleum, power**
- **AAA “responds to emergencies that could impact hundreds or even thousands of people”**
- **Any failure in AAA’s “ability to communicate by radio could have severe consequences on public welfare”**
- **In emergencies, AAA’s operations “can take on an almost quasi-public safety function”**

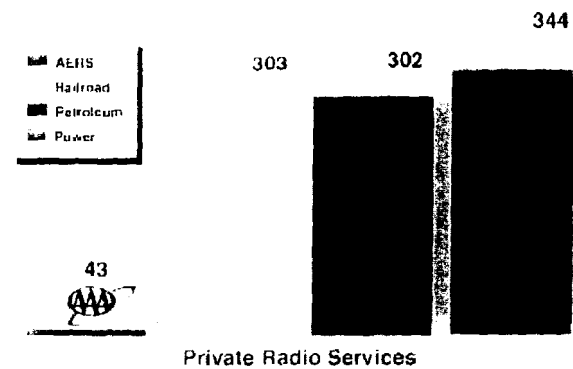
# Minimal Impact

Frequency Comparison Between Automobile  
Emergency Radio Service and Industrial/Business  
Pool (below 800 megahertz)



May 1998

Frequency Comparison Between Automobile  
Emergency Radio Service and 3 "Quasi-Public  
Safety" Services (below 800 megahertz)



May 1998

Comparison of Mobile Radio Units Within  
Industrial/Business Pool

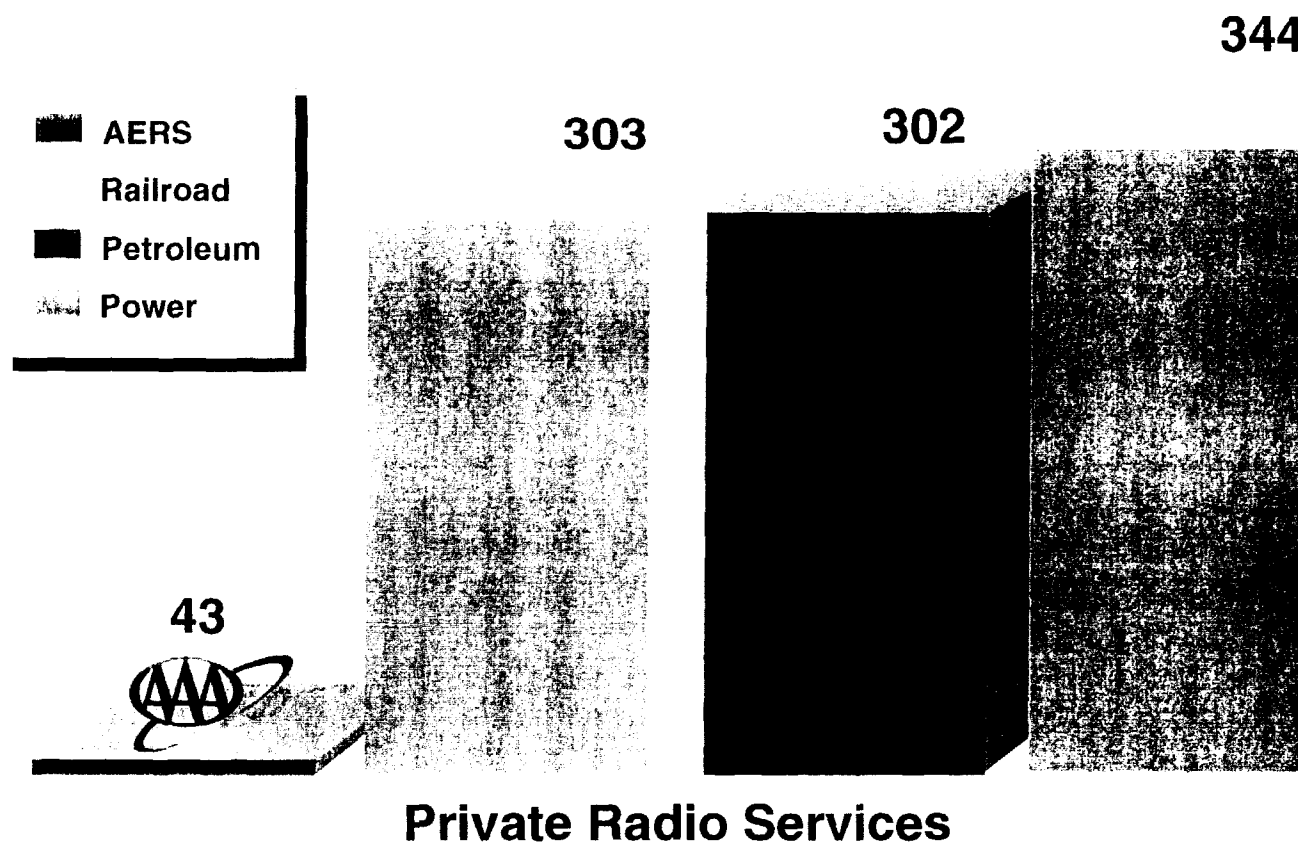
10,000,000  
Mobile Radio Units



24,999  
Mobile  
Radio Units

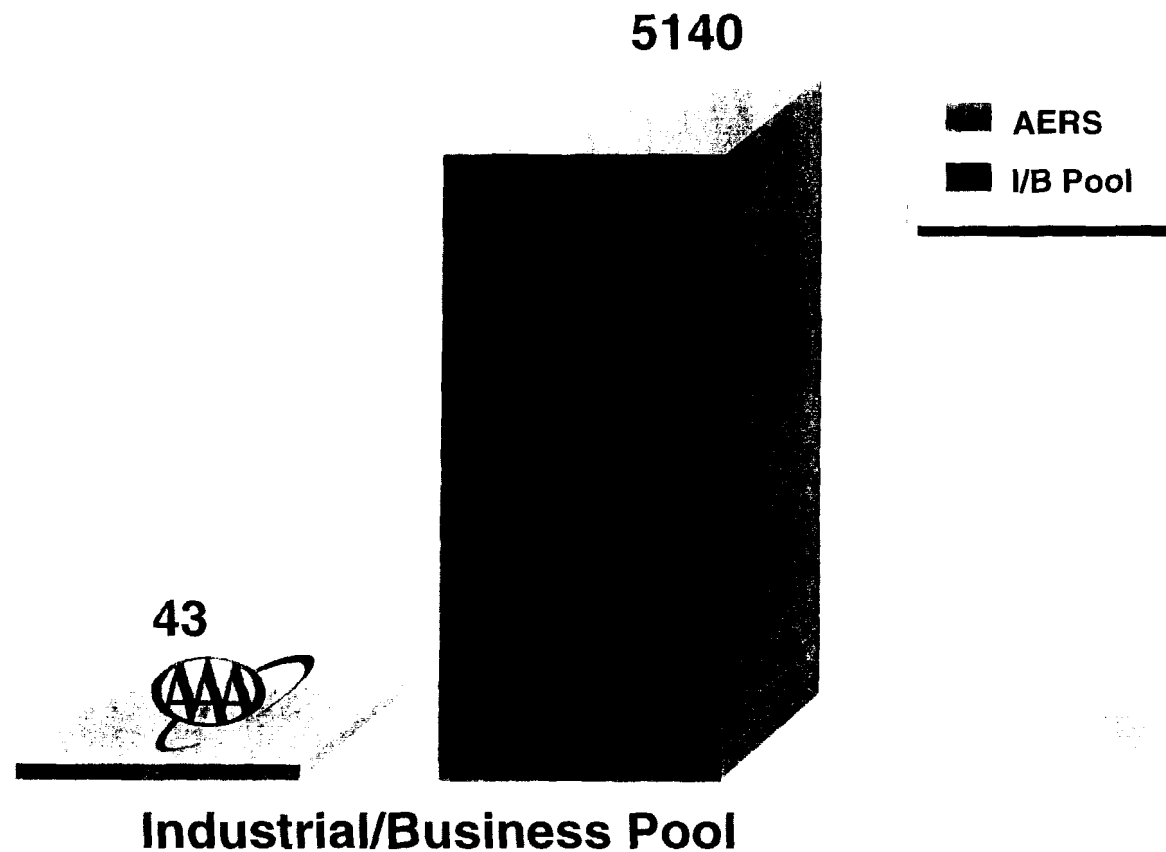
May 1998

# Frequency Comparison Between Automobile Emergency Radio Service and 3 "Quasi-Public Safety" Services (below 800 megahertz)



May 1998

# Frequency Comparison Between Automobile Emergency Radio Service and Industrial/Business Pool (below 800 megahertz)



May 1998



# Comparison of Mobile Radio Units Within Industrial/Business Pool

10,000,000  
Mobile Radio Units

■ I/B Pool  
■ AAA



24,999  
Mobile  
Radio Units

May 1998

# AAA's Vital Public Safety Role

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- **Congress recognized AAA's public safety role through an exemption from auctions contained in the 1997 Budget Act**
- **Auto emergency is the only “public safety radio service” identified by Congress that was included in the Industrial/Business pool with no control over coordination of frequencies**
- **Many public safety entities have also endorsed AAA's need for “quasi-public safety” status**

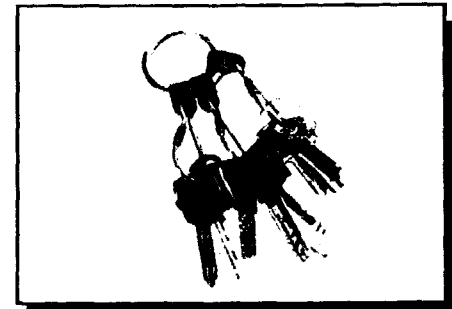
# AAA Public Safety Efforts



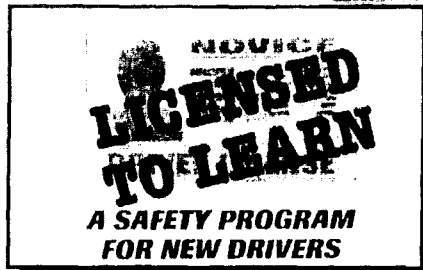
Natural Disasters



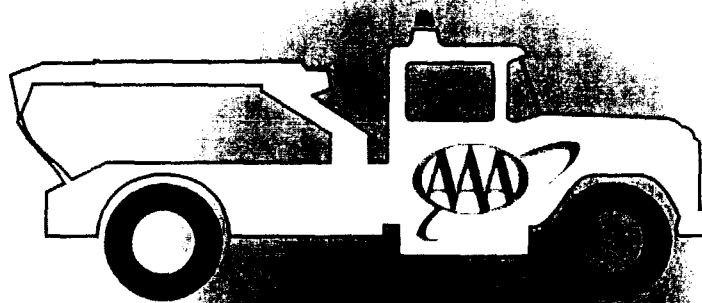
Breakdowns



Emergency Lockouts



Busy Highway



Incident Management Response



Stranded Motorist/  
Unfamiliar Areas

May 1998